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Attorneys for Plaintiff  
United States of America

IN THE UNITED STATES DISTRICT COURT  
EASTERN DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,  
  
Plaintiff,  
  
v.  
  
ALFREDO ALVAREZ SANCHEZ,  
RAUL MUNOZ NAVARRO,  
INOSENCIO CRUZ  
  
Defendants.

CASE NO. 1:24-CR-00305-JLT-SKO

STIPULATION AND ORDER REGARDING  
EXCLUDABLE TIME PERIODS UNDER SPEEDY  
TRIAL ACT;

**STIPULATION**

1. By previous order, this matter was set for status on June 18, 2025.
2. By this stipulation, defendants now move to continue the status conference until October 15, 2025, and to exclude time between June 18, 2025, and October 15, 2025, under Local Code T4.
3. The parties agree and stipulate, and request that the Court find the following:
  - a) The government has represented that the discovery associated with this case includes voluminous wiretap data, extractions of digital devices, photographs, videos, and over 83,000 pages of documents. All of this discovery has been either produced directly to counsel and/or made available for inspection and copying. Supplemental discovery has also been produced.
  - b) Counsel for defendants desire additional time consult with their clients, to review

1 the current charges, to conduct investigation and research related to the charges, to review and  
2 copy discovery, to discuss potential resolutions, to prepare pretrial motions, and otherwise  
3 prepare for trial.

4 c) Counsel for defendants believe that failure to grant the above-requested  
5 continuance would deny them the reasonable time necessary for effective preparation, taking into  
6 account the exercise of due diligence.

7 d) The government does not object to the continuance.

8 e) Based on the above-stated findings, the ends of justice served by continuing the  
9 case as requested outweigh the interest of the public and the defendant in a trial within the  
10 original date prescribed by the Speedy Trial Act.

11 f) For the purpose of computing time under the Speedy Trial Act, 18 U.S.C. § 3161,  
12 et seq., within which trial must commence, the time period of June 18, 2025 to October 15, 2025,  
13 inclusive, is deemed excludable pursuant to 18 U.S.C. § 3161(h)(7)(A), B(iv) [Local Code T4]  
14 because it results from a continuance granted by the Court at defendant's request on the basis of  
15 the Court's finding that the ends of justice served by taking such action outweigh the best interest  
16 of the public and the defendant in a speedy trial.

17 4. Nothing in this stipulation and order shall preclude a finding that other provisions of the  
18 Speedy Trial Act dictate that additional time periods are excludable from the period within which a trial  
19 must commence.

20 IT IS SO STIPULATED.

21  
22  
23 Dated: June 4, 2025

MICHELE BECKWITH  
Acting United States Attorney

24  
25 /s/ ANTONIO PATACA  
ANTONIO PATACA  
Assistant United States Attorney  
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1 Dated: June 4, 2025

/s/ CLEMENTE JIMENEZ  
CLEMENTE JIMENEZ  
Counsel for Defendant  
RAUL NAVARRO

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4 Dated: June 4, 2025

/s/ MARK REICHEL  
MARK REICHEL  
Counsel for Defendant  
ALFREDO ALVAREZ SANCHEZ

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9 Dated: June 4, 2025

/s/ TONI WHITE  
TONI WHITE  
Counsel for Defendant  
INOSENCIO CRUZ

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14 **ORDER**

15 In light of the Defendant's arraignment on the superseding indictment on March 24, 2025, the  
16 parties' request to continue the status conference from June 18, 2025, to October 15, 2025, at 1:00 p.m.  
17 is GRANTED. Time is excluded through October 15, 2025, pursuant to 18 U.S.C. § 3161(h)(7)(A),  
18 B(iv).

19 IT IS SO ORDERED.

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21 Dated: 6/5/2025

22 *Sheila K. Oberto*

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24 The Honorable Sheila K. Oberto  
25 UNITED STATES MAGISTRATE JUDGE  
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